

Exhibit E

Marguerite Behette

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

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JOHNN BASCI, et al,

**AFFIDAVIT OF
MARGUERITE BEHETTE**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF KINGS)

MARGUERITE BEHETTE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 8211 Narrows Avenue, Brooklyn, New York 11209
2. I am currently 57 years old, having been born on June 22, 1964.
3. I am the sister of Michael Behette, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. Michael passed away from lung cancer on September 17, 2012, at the age of 55. It has been medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. Michael was very involved in my life, my mother's life, and the life of my children. He, along with my mother, were the go-to people in my life for everything, and he

became the same for my kids. He always did stuff with them, like going to parks, museums, shops.

6. Michael spent months at Ground Zero as part of the search and recovery efforts in the aftermath of the attacks. I felt like he was always there. He was a firefighter and was there looking for his fallen brothers and sisters. He actually did an interview on Larry King where he described how horrible the experience was, as well as the smell.

7. In 2011, my mother informed me that Michael had a mass on his lung and had been diagnosed with cancer. He had kept some of the symptoms of his illness secret from us, as he did not want to burden others with it. But that was who he was. He always was concerned with others more than himself. I remember a conversation I had with Michael where he told me that he was going to get checked. This created a false sense of security for me, as if everything was going to be ok. But it was not.

8. Michael's illness progressed quickly. He underwent chemotherapy and fought as hard as he could, but he was very sick. It came to a point where he could not even walk. He became frustrated because all the time he spent fighting his illness took away from the time he could be spending with his family. His illness changed not only his life, but also the lives of our family across the board. I spent much of my own time trying to help Michael while he was sick, such as helping him move around or bringing family to see him. I also tried to help Michael keep his spirits up, and we all made sure that he was never alone, even when he was in hospice.

9. It has been almost 10 years since Michael passed away. To this day, when I think about him and how he suffered, I cannot stop crying. It was horrific. His illness impacted every area of our lives and had a ripple effect in our family and beyond. I am still trying to clean up the

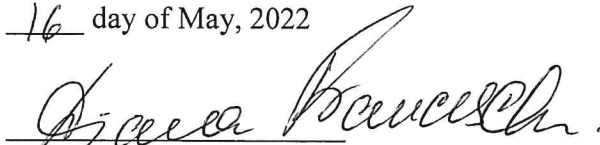
fallout from it all, especially the impact it had on my mother. I could not even mention Michael's name to my mother without making her cry up until the day she died.

10. All the opportunities that our family would have had with Michael were lost with his passing. I specifically think of all the opportunities my kids lost, as well as all the future time they would have spent with him. They only got to know Michael a bit since they were young. They were only able to share visits to museums and to the park with him, as well as rides in the car with him listening to the Beatles. They'll never get to share the many other experiences they would have if he was in their lives as they got older. It devastated all of our lives. I feel like we lost everything, especially his support emotionally, physically, and spiritually.

11. Michael was the glue and balance in our life. He was the strong guy in our family and a fireman, and he helped us with everything. I never would have expected anything to happen to him. To this day, speaking about my experience and what my family and I suffered through continues to make me visibly upset.


MARGUERITE BEHETTE

Sworn to before me this
16 day of May, 2022


Notary Public

DIANA FRANCESCHI
NOTARY PUBLIC, State of New York
No. 01FR6283237
Qualified in Kings County
Commission Expires June 3, 2025

Madeleine Behette

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOHNN BASCI, et al.,

**AFFIDAVIT OF MARGUERITE
BEHETTE ON BEHALF OF
MADELEINE BEHETTE**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF KINGS)

MARGUERITE BEHETTE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 8211 Narrows Avenue, Brooklyn, NY 11209.

2. I am the daughter, and personal representative of the Estate, of Madeleine Behette, who passed away on October 10, 2019.

3. Madeleine Behette was the mother of Michael Behette, upon whose death her claim is based. This Affidavit is submitted on behalf of Madeleine Behette in connection with the pending motion for a default judgment and in support of her estate's solatium claim.

4. Michael Behette passed away from lung cancer on September 17, 2012, at the age of 55. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Madeleine and Michael were inseparable. They were always together. Michael never married, so he always took care of our mother. They were each other's confidant and very involved in each other's lives. Michael was our mother's emotional and spiritual support. He

would help her around the house, drive her wherever she wanted to go, and take her places just to spend time together. Michael and our mother spent a lot of time babysitting and helping out with my kids together.

6. Madeleine was aware of Michael's exposure after 9/11. She had always been so proud of him for being a firefighter, but, of course, like every mother, she worried about him. It was a dangerous job, and she always feared the worst. Michael was in Florida on vacation at the time of the attacks. He drove back to New York when he heard what happened, and he immediately stepped into action and responded to the World Trade Center. Madeleine saw Michael briefly when he came back, and he told her he was going down to ground zero to help with the clean-up effort. He worked there for several months.


7. When our mother learned of Michael's lung cancer, she was completely devastated. Nothing was ever the same for her after his diagnosis. She tried to act normal, but his illness took a physical and emotional toll on her in every way. She gave up everything to take care of Michael. Her personal life, social life, and work life all took a backseat to taking care of him. She took care of all of his medical bills and the cost of any kind of treatment. She drove him to every doctor's appointment, took care of him at home, made sure he was comfortable, and gave him all of his medication. She would try to understand everything going on at the hospital, always wanted to see if there was something else that could be done for him. She wanted to do everything she could to try and change his prognosis. She wanted to lift his spirits. A lot of times, she invited his friends, brothers from the firehouse. She did whatever she could to keep him going and keep him comfortable. She prayed several times a day for his recovery.

8. The stress of Michael's illness was really daunting for Madeleine. You could see it on every level of her being. She became depressed, had difficulty sleeping, completely lost her appetite, and didn't have the energy and the drive in her daily life like she had before his illness. She was consumed with taking care of Michael and staying by his side. When he passed, a part of our mother died alongside him. She was extremely bereft by his passing. She carried

that sadness with her until the day she died.


MARGUERITE BEHETTE
on behalf of MADELEINE BEHETTE

Sworn to before me this
16 day of May, 2022


Notary Public

DIANA FRANCESCHI
NOTARY PUBLIC, State of New York
No. 01FR6283237
Qualified in Kings County
Commission Expires June 3, 2025

Brendan J. Carlock

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOHNN BASCI, et al.,

**AFFIDAVIT OF
BRENDAN J. CARLOCK**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY)
 : SS.:
COUNTY OF MONMOUTH)

BRENDAN J CARLOCK, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 56 Liberty Place, Hazlet, New Jersey 07734.
2. I am currently 65 years old, having been born on October 10, 1956.
3. I am the brother of Owen Thomas Carlock, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My brother passed away from respiratory disease on May 23, 2012 at the age of 58. It was medially determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. Owen and I were like most siblings, closer in childhood. We were very close when we were kids. We went our separate ways in our teens and twenties. I went to the professional, white-collar route, while Owen ultimately ended up in the FDNY. We moved apart from each other, and Owen got married and had kids. I never married or had children. Despite our different paths, we maintained a good brotherly relationship.

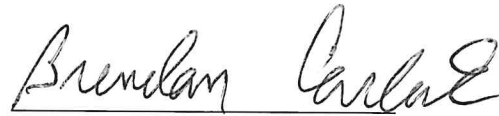
6. On September 11th, 2001, Owen was buried in the debris of one of the falling buildings. He was missing in action for a while before he resurfaced, which was around midnight or maybe early the next day. During those hours until we heard from him, the family was extremely worried for his safety. After that, Owen continued to work on the pile. When he wasn't on the pile, he was assigned to visit and comfort families of missing firemen who hadn't been found yet. I am not sure which was worse – the painstaking work on the pile or the heartbreak of having to visit families of deceased firemen who didn't yet know the fate of their loved ones. Either way, I'm sure it was a horrible experience, but Owen didn't like to talk about it much.

7. I wasn't really aware of the physical side of Owen's illness for a long time. I only understood how it was impacting him mentally. I could relate because throughout the 2000s, I had some medical issues of my own and know what I went through mentally. During that time, Owen and I wouldn't be in touch for months at a time, but when we did reconnect, I was always happy to speak with him. Although Owen didn't physically pass away until 2012, I could tell that something inside of him died on 9/11. The twenty-five or thirty guys who he had worked with, his best friends, and the guys who he went through the academy with, all died on 9/11. Owen didn't confide in me about his physical health. I truly believe that he felt that he survived the entire ordeal and had no right to complain.

8. Owen loved his family, especially his kids. He always hustled and worked hard for his family. Somewhere deep inside, he must have known that his life may be cut short and there was a possibility of becoming ill because of the foul air quality. I wish we had been closer. It hurts me when I think of his death. No matter what Owen was going through before 9/11, he was happy. He was always smiling and telling jokes to make people laugh. After 9/11, something inside of him changed. That's the best way I could describe it.

9. I wish my brother and I could have spent more time together, but I'm grateful that we reconnected and that I was able to speak with him during his illness. I would have liked if he had opened up to me more about what he was going through, but Owen was a private person

and never wanted to be a burden. He passed away far too young, and I miss my brother terribly.



BRENDAN J CARLOCK

Sworn to before me this
16th day of May, 2022


Notary Public

BRIAN R WERNER JR
NOTARY PUBLIC, NEW JERSEY
MONMOUTH COUNTY, COMM# 50111683
COMMISSION EXPIRES ON AUG 29, 2024

Edmond B. Carlock

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al.,

AFFIDAVIT OF
EDMOND B. CARLOCK

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
 : SS.:
COUNTY OF SOMERSET)

EDMOND B. CARLOCK, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 145 Mountain Avenue, Warren, New Jersey 07059.

2. I am currently 70 years old, having been born on July 4, 1951.

3. I am the brother of Owen Thomas Carlock, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My brother passed away from respiratory disease on May 23, 2012 at the age of 58. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Owen and I were close growing up. We loved to repair cars together. Since I was a mechanic, I'd always try to figure out ways to make his car go faster. We were a tight-knit family. Owen had a great sense of humor, and he loved being an FDNY firefighter. He put his heart and soul into being a fireman. Owen and I lived about a half-hour away from each other, and we would share holidays together and see each other often. Owen, my brother Neil, and I

were like the Three Musketeers. We had all the same friends growing up. I'm the oldest brother, Neil was the second, and Owen was the third. Neil was a Navy Top Gun fighter pilot, who was killed in a training accident. Owen died due to his 9/11-related illness. My closest siblings are gone now.

6. On September 11th, 2001, Owen was working at Ladder Company 122 in Brooklyn. He was called to respond to the attacks on the World Trade Center. Owen's boss had ordered him to move a truck, and as he did, the towers started to collapse. He and other firemen were running from the falling debris. All hell had broken loose. The phone lines were down and we couldn't reach him. The entire family was panicked with worry. He came home after two days. His eye sight had been affected due to the dust in his eyes. As soon as he could, Owen returned to Ground Zero for search and recovery. He continued there for several months. Afterwards, Owen didn't want to talk about 9/11. I remember he was selected to represent the firemen of 9/11 in a memorial service in North Carolina and had to give a speech. All he could say was, "I'm not the hero. I was just doing my job." He never mentally recovered from 9/11. He'd break down crying if he talked about it, even years afterwards.

7. I started to notice Owen's physical condition declining in the years after 9/11. He had a constant cough and shortness of breath. He had less energy, and he was very despondent. He was always going to the doctors' office, and I remember he was taking about eighteen different medications before he died. He had lungs problems and would always cough up phlegm. The heavy coughing put a strain on his heart.

8. During the time Owen was ill, I tried to see him as much as I could. Another one of our brothers lived nearby, and we would all go together to see car shows. It was harder for me because I wasn't retired, so I didn't have as much time to spend with him. Owen had a favorite bar, and he actually had his own seat there. Since his passing, it is still considered "his seat"—no one sits there. That's how much people respected Owen.

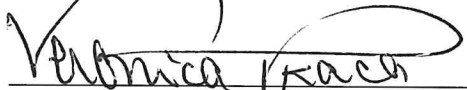
9. The number of firemen who showed up at Owen's funeral was incredible. These guys testified that, if it wasn't for Owen, they wouldn't be alive today. When I lost Owen, I lost my best friend. Owen had a lot to live for. He had a beautiful family. His loss truly affected his children and extended family, including me. Each year on the anniversary of his death, we have a small gathering at the cemetery. Some of his friends from the FDNY always show up. It's so

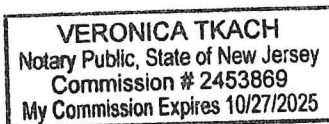
comforting to know that he is still remembered and respected that way. It's been years since he passed, but I still miss him.

10. It's upsetting that more of Owen's friends from the FDNY are passing away due to 9/11-related illnesses. His firemen friends were also his brothers. The threat of these 9/11-related illnesses is like a black cloud hanging over them. After 9/11, they knew that they had to brace themselves for the illnesses and deaths to come, but that didn't stop them. That's who they all were – true heroes and patriots until their very last breath.


EDMOND B. CARLOCK

Sworn to before me this
9 day of May, 2022


Notary Public



Emily Frances Carlock

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOHNN BASCI, et al.,

**AFFIDAVIT OF
EMILY FRANCES CARLOCK**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY)

: SS.:

COUNTY OF MONMOUTH)

EMILY FRANCES CARLOCK, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 39 Crest Road, Middletown, New Jersey 07748

2. I am currently 39 years old, having been born on April 18, 1983.

3. I am the daughter of Owen Thomas Carlock, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from respiratory disease on May 23, 2012 at the age of 58. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father worked often, but when he was home, he was always present. We had a good relationship. We shared lots of laughs and had lots of fun. It was a typical father-daughter relationship. He was one of my best friends.

6. September 11, 2001 was my first day of college. What should have been a day of joy and excitement turned out to be one of sheer terror. I called my mom and learned my dad

had gone to the World Trade Center site. There was no way to know if he was dead or alive. We did not know anything until the next day when we received a call from him. He didn't come home until a couple days later. When he did, he was in bad shape. I remember his eyes being red, swollen, and ashy. He didn't want to tell us what he saw. He would never tell us much of what he witnessed. It wasn't long before he went back to the site to help with the cleanup. He stayed there for weeks on end.

7. I experienced my father's illness firsthand. He was coughing constantly, which often led to vomiting. The combination of constant vomiting along with his GERD caused his voice to change. His voice became shaky and raspy. It was no longer the voice of the father I had once known. He was always going to doctor appointments. Between college and my job, I didn't get to go to as many of his appointments as I would have liked. The doctors tried many different treatments, but nothing helped with his symptoms. They even tried a sleep apnea machine, which I know he didn't like to use. On May 23, 2012, I received a call from my mother at 2:00 a.m. I knew what it was about before I even answered. My father, who was vacationing with some of his FDNY friends, had passed away. He had been having terrible coughing spells and difficulty breathing. As a result, he suffered a massive heart attack. I was devastated. I had recently given birth, and my daughter was only seven weeks old at the time.

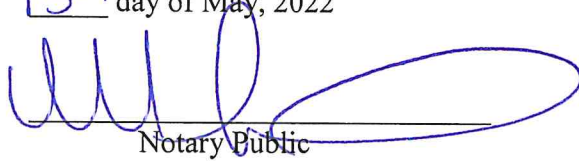
8. After 9/11, I was happy my dad was alive. Even after he fell ill, I was still grateful. So many people lost a father, and I still had mine. When he died, that changed in an instant. What had once been happiness turned instantly into resentment. I lost my father. My daughter lost her grandfather. I will have to live the rest of my life without him, and his grandchildren will never get to know their grandfather. This will forever be painful.

9. My father was robbed of a healthy and happy life. My family was robbed. I was robbed. There is so much more time we should have had together. So many experiences and memories left to make. We will never get the chance. My father should be here to see his grandson and granddaughter grow up. There are so many things my father is missing out on.

The world, my family, and I were robbed of a special man.


EMILY FRANCES CARLOCK

Sworn to before me this
13th day of May, 2022


Notary Public



MELISSA KAREN SETTEMBRINO
NOTARY PUBLIC
STATE OF NEW JERSEY
ID # 2432148

MY COMMISSION EXPIRES APRIL 4, 2023

Evan George Carlock

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al.,

AFFIDAVIT OF
EVAN GEORGE CARLOCK

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF PENNSYLVANIA)
 : SS.:
COUNTY OF CHESTER)

EVAN GEORGE CARLOCK, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 807 East Boot Road, Apt. 4, West Chester, Pennsylvania 19380

2. I am currently 32 years old, having been born on February 28, 1990.

3. I am the son of Owen Thomas Carlock, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from respiratory disease on May 23, 2012 at the age of 58. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

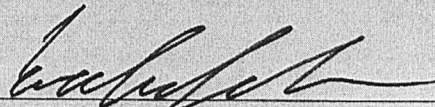
5. I am my father's only son. This created a special bond between us. We would attend car shows and spend time together just as father and son. Car shows were a big bonding experience for us. We really enjoyed them. My dad worked a lot. Whenever he was off from work, he made sure to attend my hockey games.

6. I was only 11 years old on 9/11. My father never liked to talk about that day, so everything I know I learned second hand. My dad got to the World Trade Center site right before the towers fell. He was by the Deutsche Bank Building, adjacent to the towers, when the first tower began to fall. He was with a group of guys from Ladder 122 and a captain from another firehouse. They hid in an alcove next to the bank to try to escape the falling debris. My father saved two firefighter's lives by pulling them into the alcove. They were enveloped in a cloud of dust that turned day into night. Many of the men, including my father, got so much dust and debris in their mouths, it immediately caused them to vomit. My father spent three days searching for survivors before he came home. All he found were remains. Yet, he still went back to continue with the clean-up and stayed for months. He was exposed to the toxic air for a prolonged period of time.

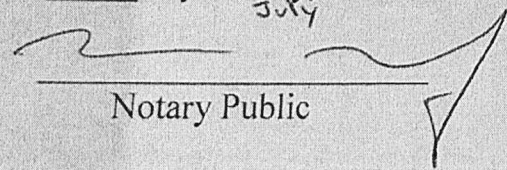
7. My father's illness became obvious to me a few years after 9/11. He was throwing up 3-4 times a day. He coughed constantly. I could just tell something was off. I didn't realize how serious it was until it was too late. I received a call from my mother at 2:00 a.m. while they were on vacation with other FDNY friends. She told me my dad had passed away. I was in Pennsylvania at the time and immediately decided to make the drive home. That felt like the longest drive of my life.

8. Learning of my father's death was like having a piece of me ripped away. A piece I will never get back. I've been left with a big empty hole. It was devastating. In a split second, I went from having a father to being fatherless. I miss him. He has missed many important moments in my life and will miss many more.

9. My father's life and death were not in vain. He helped so many people. He made a difference in this world. He was a stand-up guy, who touched many lives. He deserves to be remembered for what he was—a true hero.


EVAN GEORGE CARLOCK

Sworn to before me this
25th day of May, 2022
JULY


Notary Public

Gil Raymond Carlock

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al.,

AFFIDAVIT OF
GIL RAYMOND CARLOCK

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
: SS.:
COUNTY OF MONMOUTH)

GIL RAYMOND CARLOCK, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 43 Millbrook Drive, Middletown, New Jersey 07748.

2. I am currently 61 years old, having been born on May 25, 1960.

3. I am the brother of Owen Thomas Carlock, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My brother passed away from respiratory disease on May 23, 2012 at the age of 58. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Out of our six siblings, I was closest with Owen. We spent time together camping, going on vacation, and having family dinners. We enjoyed each other's company, and we had a lot in common.

6. On September 11 2001, my brother responded as an FDNY fireman to the attacks on the World Trade Center. He was walking towards the towers when the South Tower started

to collapse. Debris was flying everywhere, so he and five other firemen found shelter in the alcove of a bank. Fortunately, he came out alive. He was caught in a dust cloud and couldn't see anything through the dust. The particles got into his eyes and mouth, which caused him to vomit. He wasn't able to contact any of us because the phone lines were knocked out, so the family was in somewhat of a panic over his fate. He managed to call the following day to let us know he was alright. He came home two days later a changed man. There was no more glister in his eyes. Owen had witnessed people jumping out of the buildings to their death and experienced the devastation of sifting through body parts on the pile. He spent a long time working at the FDNY Command Center near Ground Zero in the weeks and months after the attacks.

7. Owen didn't like to talk about his experience working on the pile. There was a big personal change within him after 9/11. For most of his life, he was animated, colorful, and always telling jokes. He was an easy-going, fun-loving person, but after 9/11 that was gone. It is hard to get over something traumatic like that. He had resentment towards the world. September 11th took a toll on his psyche.

8. In the years following 9/11, Owen's respiratory health declined. He would call me when he received results back from different tests, and the results were getting worse over time. Even though he was getting sick, he would try to hide it from everybody. Toward the end, he was vomiting a lot. We'd have dinner as a family, and Owen would have to excuse himself to vomit in the bathroom because he couldn't hold any food down. He was always coughing up something. He wasn't as active as he used to be. It was dismaying to see his condition decline, because he was a healthy person before 9/11. He was strong as a bull. His mental and physical health completely changed after 9/11.

9. On May 23rd, my wife woke me up at 3:00 a.m. to tell me Owen had died. He was on vacation with his friends from the Fire Department when it happened. From there, I took over. I called the funeral home to arrange his funeral, got his Will in order, and ordered the autopsy. Owen's firefighter friends all showed up to his funeral. He touched so many lives.

10. I miss my brother more than I can say. I didn't get to spend as long with him as I wanted to. Owen had children, now he has grandchildren who he's never going to meet. He was a young man, only 58 years old at the time of his death. As the years go on, it is still hard to

accept his death. He should have had twenty-five, even thirty more years left in him. Everything changed because of 9/11.

11. Owen was a good, kind-hearted man, and he would do anything for anybody without expecting anything in return. He could take a joke and make a joke. He was a great guy, always laughing at himself. He was compassionate and a great father. He would have been a wonderful grandfather. It's unfortunate and unfair that he was taken so soon.



GIL RAYMOND CARLOCK

Sworn to before me this
9 day of May, 2022



Notary Public

ALEX JARA
Notary Public
State of New Jersey
My Commission Expires Feb. 10, 2027

Jacquelyn Mae Carlock

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOHNN BASCI, et al.,

**AFFIDAVIT OF
JACQUELYN MAE CARLOCK**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY)

: SS.:

COUNTY OF MONMOUTH)

JACQUELYN MAE CARLOCK, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 39 Crest Road, Middletown, New Jersey 07748.

2. I am currently 36 years old, having been born on April 16, 1986.

3. I am the daughter of Owen Thomas Carlock, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from respiratory disease on May 23, 2012 at the age of 58. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My dad and I were very close. We had a fun relationship, and we always had a good time together. The best part of my childhood was going to his firehouse with him for FDNY family events. I loved sitting on the fire engine and taking pictures. I always felt safe and protected by him. It was a great relationship. He was one of my best friends and closest confidants.

6. I was in high school on 9/11/2001. My biggest concern that morning was doing my hair for picture day. There was an announcement over the loud speaker that an attack had occurred on the World Trade Center. My dad worked for the FDNY in Brooklyn, not Manhattan, so I naively thought he would be okay. Little did I know he was already on his way to the World Trade Center. My dad really never told me much about that day. Most of what I know now, I learned from old interviews he did and from his friends. He got to the WTC right before both towers fell. He was by the Deutsche Bank Building when the towers began to fall. He was with a group of guys from Ladder 122 and a captain from another firehouse. They hid in an alcove next to the bank. My father saved two firefighters' lives by pulling them into the alcove. They were enveloped in a cloud of dust that turned day into night. Many of the men, including my father, got so much dust and debris in their mouths, it immediately caused them to vomit. My dad got so much dust in his eyes that his eyesight was affected for a while. He spent three days in the rubble searching for survivors before he came home. Sadly, all he found were remains. Yet, he still went back and worked for months as part of the clean-up crew.

7. My father's illness started when I was still too young to realize what was going on. At first, I saw a change in his mental state. I couldn't talk to my dad as often as I wanted to. He didn't want to talk much. He had become a different person, one who was more withdrawn and depressed. I eventually came to learn that these were symptoms of his PTSD. Then, he began to suffer from a persistent cough. The coughing fits would sometimes become so bad that they forced him to vomit. I noticed there were certain foods he could not eat, because they would give him acid reflux. My father suffered from bronchitis, sleep apnea, and laryngospasms as well. He was always sweating and coughing upon coming home from work. He would fall asleep on the couch, and I'd constantly check in on him just to make sure he was still breathing.

8. I tried to help my dad in any little way I could. He was a proud and independent man. He never asked anyone for help. He didn't want to let people know how bad things were. I took over my car payment in order to try to take some weight off his shoulders.

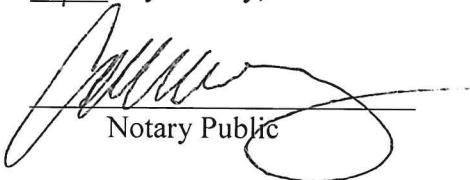
9. My dad's illness and death changed me. I was a young and carefree child who became a hardened adult. My life changed forever. I attend therapy once a week. The shock of his death gave me PTSD myself. He was on vacation with his friends in the FDNY when he died. We received a call in the middle of the night that he had passed away. I was stunned—

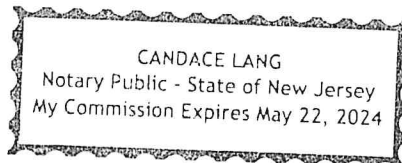
only ten days earlier, he went for a cardiac evaluation and seemed okay. He was having terrible coughing fits and a hard time breathing while he was away, which caused him to have a fatal heart attack. You never think that you'll receive a phone call that will change your life forever. Five years after his death, I went into a deep depression. I was still in a state of shock and disbelief. His death didn't, and still doesn't, feel real to me. I still see him in my dreams. I wake up crying and wailing from those dreams. He will never be there for all the important events of my life. He will never meet my kids. I never thought he would die so young.

10. My father was a great man, a true stand-up guy. His funeral service was on Memorial Day weekend. The stories I heard and people I met, I will never forget. We fought hard to have his name on the Wall of Remembrance. He loved his job. He loved the brotherhood and camaraderie of the fire department. Ultimately, his work as a fireman is what took his life. Yet, he wouldn't have done anything differently. I just feel robbed. Especially the night he passed away. It was truly awful. They couldn't even intubate my dad at the time of his death because his airways were shut. I became a nurse and did all the research I could into my dad's illness. I thought that if I could figure out why my father had a heart attack, it would bring me closure. Sadly, it has not. I wish every day that my dad was still here. His loss was something I will never get over.


JACQUELYN MAE CARLOCK

Sworn to before me this
9th day of May, 2022


Notary Public



Shirley Jean Carlock

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al.,

Plaintiffs,

**AFFIDAVIT OF
SHIRLEY JEAN CARLOCK**

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF NEW JERSEY)

: SS.:

COUNTY OF MONMOUTH)

SHIRLEY JEAN CARLOCK, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 39 Crest Road, Middletown, New Jersey 07748.

2. I am currently 63 years old, having been born on March 8, 1959.

3. I am the wife of Owen Thomas Carlock, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from respiratory disease on May 23, 2012 at the age of 58. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Owen and I shared a true partnership. We did everything together. Every decision we made, we made as a couple. We loved to vacation whenever we could, and enjoyed going out on dinner dates. Our children and the life we shared were our pride and joy. It was a beautiful marriage.

6. I remember 9/11 as clear as day. We had just moved into a new home, and it was picture day at school for our daughter. She wanted her hair to be perfect for pictures, and insisted that Owen be the one to help her. This caused him to be late to work. Owen being late to work meant that he had to ride with the engine company. The engine company was running behind also and was late getting to the World Trade Center. They arrived as the first tower started to come down. Owen hid in an alcove by the Deutsche Bank building and pulled six firemen into the alcove with him. He saved their lives. The alcove spared their lives, but did not spare them from being covered in soot and debris. It was three or four days before I saw Owen again. He wanted to do everything in his power to help find anyone possibly trapped. When he finally got home, there was a different man standing on my porch. He had lost the spark in his eye. He told me all the things he saw and went through and said that he could never speak of those things again. It was a perfectly horrible day.

7. The changes in Owen were evident from the second he got home from ground zero. He became withdrawn, and his outlook on life changed. Instead of looking toward the future, he only saw a "ten-year plan" for himself. He saw a countdown clock on his life that followed him everywhere. His mental state was in a constant decline. He was always sad. Owen was no longer the happy-go-lucky man I knew who was always laughing and smiling. He had become very serious, rarely smiled, and hardly ever laughed. Eventually, other symptoms came along with his severe PTSD. He developed a constant cough that would often lead to vomiting. He had chronic bronchitis and sleep apnea. His doctor said Owen's sleep apnea was one of the worst cases he had ever seen. He had to use a CPAP machine at night. To me, Owen never appeared healthy again. He was always nauseous and had to excuse himself from family dinners to vomit because he couldn't hold food down. His illness put a great strain on his heart, which ultimately lead to his heart attack and death.

8. I was my husbands primary care taker. He wasn't bedridden, but his health was in a state of constant decline. He was forced to retire from the FDNY on disability due to his respiratory issues.

9. Every morning, every night, every second, I am thinking of Owen. He has missed our son's wedding, our daughter's graduations, and the births of his grandchildren. Further, every aspect of my life has changed. My future was taken away from me. I had to recreate a

whole new life alone. Work around the house is hard, and every decision rests solely on my shoulders. It took a toll on me financially as well. I had to fight the city for eight years to get the WTC Widow's pension. If I didn't get that, I wouldn't be able to afford to live in my own home. Owen's death has left a huge void in my life. It's hard to go on without him.

10. Owen was truly beloved by everybody. Not one person in this world had a bad word to say about him. I never realized how much he was loved by others until his wake. There was a constant flow of people coming in to pay their respects. Even people who he had only met once or twice in his life came to his wake. The outpouring of people was truly remarkable. I often think of that quote from *It's a Wonderful Life*, "No man is a failure who has friends," and how it applies to Owen. There's such a void in our lives, such emptiness now that he is gone. He is truly missed.


SHIRLEY JEAN CARLOCK

Sworn to before me this
5 day of May, 2022



Notary Public

ALEX JARA
Notary Public
State of New Jersey
My Commission Expires Feb. 10, 2027